

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
KARINA PIA LUCID, ESQ., LLC 1065 Route 22 West, Suite 2B Bridgewater, NJ 08807 Tel: (908) 350-7505 Email: klucid@karinalucidlaw.com Karina Pia Lucid, Esq. <i>Counsel for the debtor, Alissa Pyrich</i>	
In Re:	
Alissa Pyrich,	Case No.: 24-10064-JKS
Debtor.	Chapter 13
	Judge: John K. Sherwood
	Hearing: June13, 2024 at 10 am

**MOTION TO EXPUNGE CLAIM NO. 8
FILED BY CREDITOR CARMINE FORNARO and/or REX FORNARO
OR ALTERNATIVELY
TO COMPEL PRODUCTION AND REDUCE OR MODIFY CLAIM**

PLEASE TAKE NOTICE that on June 13, 2024 at 10:00 a.m. or as soon as counsel may be heard, Alissa Pyrich, the debtor (the “Debtor”), in the above-referenced bankruptcy case, by and through her counsel, Karina Pia Lucid, Esq., shall move before the Honorable John K. Sherwood at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, for an Order to Expunge Carmine Fornaro and/or Rex Fornaro’s Proof of Claim (POC8), and respectfully states as follows:

JURISDICTION

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

STATEMENT OF FACTS

3. On January 3, 2024, (the “Petition Date”), the Debtor filed a petition for relief pursuant to chapter 13 of the Bankruptcy Code (the “Petition”)¹.

4. On January 23, 2024, the petition date, the Debtor filed a Chapter 13 plan (“the Plan”). The Plan has not yet been confirmed.

5. On April 3, 2024 Rex Fornaro filed Proof of Claim number 8 on behalf of Carmine Fornaro (POC8).

6. Debtor filed a modified Chapter 13 plan on April 17, 2024 in which she will try to sell her house to satisfy the Plan.

II. MOTION TO REQUEST EXPUNGEMENT OF CREDITOR’S CLAIM

7. This Court should enter an order disallowing Proof of Claim number 8.

8. The filed document fails to state a claim.

9. It is bereft of any statement of facts or proof of any alleged claim.

10. Claimant’s attachment of a retainer agreement dated January 10, 2020 with the firm Bedwell & Pyrich, LLC, fails to constitute a claim.

11. Neither Debtor nor her previous firm owe claimant any funds.

12. Proof of Claim number 8 is bereft of information and should be denied and expunged.

13. Furthermore, Debtor requests that the Court grant her fees and costs for the defense of this frivolous claim.

CONCLUSION

WHEREFORE, it is respectfully requested that the Court enter an Order expunging Proof of Claim number 8 filed by Carmine Fornaro and/or Rex Foranaro, order costs and fees to be paid to Debtor by Claimant, and for such other related relief as this Court may deem appropriate.

KARINA PIA LUCID, ESQ., LLC
Counsel for the debtor, Alissa Pyrich

/s/ Karina Pia Lucid
Karina Pia Lucid

Dated: April 24, 2024